

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA**

In re:

MERCY HOSPITAL, IOWA CITY, IOWA, *et al.*,
Debtors.

)
) Chapter 11
)
) Case No. 23-00623 (TJC)
)
) Jointly Administered
)
) Obj. Deadline: July 23, 2024 at 4:00 p.m. (CT)
)

**SUMMARY OF TENTH MONTHLY FEE APPLICATION OF
NYEMASTER GOODE, P.C., COUNSEL TO DEBTORS AND
DEBTORS-IN-POSSESSION, FOR ALLOWANCE OF COMPENSATION
AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD
FROM May 1, 2024 THROUGH MAY 31, 2024**

Name of applicant:

NYEMASTER GOODE, P.C.

Authorized to provide professional
services to:

Debtors and Debtors-In-Possession

Date of retention:

August 7, 2023

Date of order authorizing retention:

September 14, 2023, Docket No. 225

Period for which compensation and
reimbursement is sought:

May 1, 2024 through May 31, 2024

Amount of compensation sought as
actual, reasonable and necessary:

\$ 37,603.00

Amount of expense reimbursement
sought as actual, reasonable and
necessary:

\$ 369.80

This is a:

Tenth Monthly Application

SUMMARY OF NYEMASTER APPLICATIONS FOR COMPENSATION

Application	Date Filed	Period Covered	Requested Fees	Requested Expenses	Approved Fees & Expenses
First Month	10/09/23, Dkt. 347	08/07/23 – 08/31/23	\$ 57,447.60 (80% of total)	\$ 10,422.02 (100% of total)	\$ 67,869.62
Second Month	11/10/23, Dkt. 498	09/01/23 – 09/30/23	\$ 70,495.60 (80% of total)	\$ 7,253.61 (100% of total)	\$ 77,749.21
Third Month	11/27/23, Dkt. 531	10/01/23 – 10/31/23	\$ 61,730.00 (80% of total)	\$ 19,318.80 (100% of total)	\$ 80,013.40
Fourth Month	12/15/23, Dkt. 572	11/01/23– 11/30/23	\$ 35,490.80 (80% of total)	\$ 208.61 (100% of total)	\$ 35,699.41
Fifth Month	02/05/24, Dkt. 711	12/01/23– 12/21/23	\$ 31,978.80 (80% of total)	\$ 641.86 (100% of total)	\$ 32,620.66
Sixth Month	03/08/24, Dkt. 815	01/01/24– 01/31/24	\$ 65,550.00 (80% of total)	\$975.00 (100% of total)	\$ 66,525.00
Seventh Month	04/10/24, Dkt. 945	02/01/24– 02/28/24	\$ 39,839.60 (80% of total)	\$ 285.23 (100% of total)	\$ 40,124.83
Eighth Month	05/06/24, Dkt. 1019	03/01/24– 03/31/24	\$ 39,314.80 (80% of total)	\$ 543.87 (100% of total)	\$ 39,858.67
Ninth Month	06/06/24, Dkt. 1103	04/01/24– 04/30/24	\$ 27,848.00 (80% of total)	\$ 195.94 (100% of total)	\$ 28,043.94
Tenth Month	N/A	05/01/24– 05/31/24	\$ 30,082.40	\$ 369.80	N/A

**SUMMARY OF BILLING BY PROFESSIONALS
MAY 1, 2024 THROUGH MAY 31, 2024**

Name of Professional	Year of Bar Admission	Position and Practice Area	Hourly Billing Rate	Total Billed Hours	Total Compensation
Roy R. Leaf	2016	Shareholder; Litigation, <i>Bankruptcy & Creditors' Rights</i>	\$ 345.00	95.70	\$ 33,016.50
Kristina M. Stanger	2005	Shareholder; Litigation, <i>Bankruptcy & Creditors' Rights</i>	\$ 450.00	2.80	\$ 1,260.00
Stephanie G. Techau	1992	Shareholder; Litigation, <i>Workers Compensation, Insurance, Employment</i>	\$ 345.00	3.10	\$ 1,069.50
Dana W. Hempy	2021	Associate; Litigation	\$ 275.00	3.20	\$ 880.00
Sharon K. Carney	N/A	Paralegal	\$ 90.00	15.30	\$ 1,377.00
TOTALS:				120.10	\$ 37,603.00
80% OF TOTAL FEES:					\$ 30,082.40

**COMPENSATION BY PROJECT CATEGORY
MAY 1, 2024 THROUGH MAY 31, 2024**

Project Category	Total Hours	Total Fees
Case Administration	34.10	\$ 11,775.00
Schedules and Statements	0.00	\$ 0.00
Employment and Fee Applications (Nyemaster)	3.10	\$ 873.50
Employment and Fee Applications (Other)	1.50	\$ 517.50
Cash Collateral and DIP Financing	0.50	\$ 172.50
Preparation and Review of Case Pleadings	60.00	\$ 16,798.50
Meetings and Communications With Creditors	0.00	\$ 0.00
Asset Sales	2.00	\$ 662.00
Plan And Disclosures Statement	5.70	\$ 2,124.00
Executory Contracts And Leases	5.00	\$ 1,725.00
Claims Analysis And Recovery	0.00	\$ 0.00
Avoidance Actions And Litigation	8.20	\$ 2,955.00
TOTALS:	120.10	\$ 37,603.00
80% OF TOTAL FEES:		\$ 30,082.40

EXPENSE SUMMARY
MAY 1, 2024 THROUGH MAY 31, 2024

Expense Category	Service Provider (if applicable)	Total Expenses
Publication Fees	Des Moines Register	\$ 187.60
Publication Fees	Iowa City Press Citizen	\$ 182.20
TOTAL:		\$ 369.80

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA**

In re:)	
)	Chapter 11
MERCY HOSPITAL, IOWA CITY, IOWA, <i>et al.</i> ,)	Case No. 23-00623 (TJC)
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Debtors.)	Jointly Administered
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)	Obj. Deadline: July 23, 2024 at 4:00 p.m. (CT)
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**TENTH MONTHLY FEE APPLICATION OF NYEMASTER GOODE, P.C.,
COUNSEL TO DEBTORS AND DEBTORS-IN-POSSESSION, FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR
THE PERIOD FROM MAY 1, 2024 THROUGH MAY 31, 2024**

Nyemaster Goode, P.C. (the “Applicant” or “Nyemaster”), counsel to Mercy Hospital, Iowa City, Iowa (“Mercy”) and certain of its affiliates and subsidiaries, as debtors and debtors-in-possession (the “Debtors”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), hereby applies (the “Application”), pursuant to sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and the Court’s *Order Establishing Procedures for Interim Compensation And Reimbursement of Expenses of Professionals* (Docket No. 224) (the “Interim Compensation Order”), for allowance of compensation for services rendered and reimbursement of expenses for the period from May 1, 2024 through May 31, 2024 (the “Application Period”), and respectfully represents as follows:

1. The Court has jurisdiction to consider this Application pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b).
2. Venue of the Chapter 11 Cases and this Application in this District is proper under 28 U.S.C. §§ 1408 and 1409.

3. The legal predicates for the relief requested herein are Bankruptcy Code sections 330 and 331, Bankruptcy Rule 2016, and the Interim Compensation Order.

BACKGROUND

A. The Chapter 11 Case

4. On August 7, 2023 (the “Petition Date”), the Debtors commenced the Chapter 11 Cases by filing petitions for relief under chapter 11 of the Bankruptcy Code. The Debtors continue to operate its business and manage its properties as debtors and debtors-in-possession pursuant to Bankruptcy Code section 1107(a) and 1108.

5. On August 15, 2023, the Office of the United States Trustee for the Northern District of Iowa (the “U.S. Trustee”) appointed an official committee of unsecured creditors (the “Committee”) in the Chapter 11 Cases [Docket No. 107]. On November 4, 2023 the U.S. Trustee appointed an official committee of pensioners (the “Pension Committee”) in the Chapter 11 Cases [Docket No. 458]. No trustee or examiner has been appointed in the Chapter 11 Cases.

6. Additional information regarding the Debtors and the Chapter 11 Cases, including the Debtors’ business operations, capital structure, financial condition, and the reasons for and objectives of the Chapter 11 Cases, is set forth in the *Declaration of Mark E. Toney in Support of Chapter 11 Petitions and First Day Pleadings* [Docket No. 27].

B. The Retention of Nyemaster

7. On August 23, 2023, Debtors applied to the Court [Docket No. 145] (the “Nyemaster Application”) for an order authorizing Debtors to retain and employ Nyemaster as their counsel, effective as of the Petition Date. On September 14, 2023, the Court entered an order authorizing such retention. Docket No. 225.

C. The Interim Compensation Order

8. On September 14, 2023, the Court entered the Interim Compensation Order,¹ which sets the procedures for interim compensation and reimbursement of expenses in the Chapter 11 Cases. Specifically, the Interim Compensation Order provides that a Retained Professional may file and serve a Monthly Fee Application on or after the fifteenth (15th) day of each month following the month for which compensation is sought. Fourteen (14) days after the service of a Monthly Fee Application, the Debtors are authorized to pay such Retained Professional eighty percent (80%) of the fees and one-hundred percent (100%) of the expenses requested in the Monthly Fee Application that are not subject to an Objection.

RELIEF REQUESTED

9. Pursuant to the Interim Compensation Order and Bankruptcy Code section 331, Nyemaster is seeking compensation in the amount of \$ 30,082.40, which is equal to eighty percent (80%) of the \$ 37,603.00 in fees for professional services rendered by Nyemaster during the Application Period. This amount is derived solely from the applicable hourly billing rates of Nyemaster's personnel who rendered services to the Debtors. In addition, Nyemaster incurred \$ 369.80 in out-of-pocket expenses during the Application Period.

10. There is no agreement or understanding between Nyemaster and any other person, other than members of Nyemaster for sharing of any compensation to be received for services rendered in these Chapter 11 Cases.

A. Compensation Requested

11. Attached hereto as **Exhibit A** is a detailed itemization, by project category, of all services performed by Nyemaster with respect to the Chapter 11 Cases during the Application Period. This detailed itemization complies with the Interim Compensation Order and the

¹ Capitalized terms used but not defined shall have the meanings provided in the Interim Compensation Order.

Bankruptcy Code in that each time entry contains a separate time allotment, a description of the type of activity, and the subject matter of the activity, all time is billed in increments of one-tenth of an hour, time entries are presented chronologically in categories, and all meetings or hearings are individually identified.

12. The attorneys and paraprofessionals who rendered services related to each project category are identified in **Exhibit A**, along with the number of hours for each individual and the total compensation sought for each category.

B. Expense Reimbursement

13. Nyemaster incurred out-of-pocket expenses during the Application Period in the amount of \$ 369.80. Descriptions of the expenses actually occurred are identified in **Exhibit A** in relation to each project category. The expenses are broken down into categories of charges.

14. Nyemaster provided a wide array of legal services to the Debtors. The services rendered by Nyemaster are summarized below, and are more fully described in the detailed time entries attached to this Application as **Exhibit A**.

VALUATION OF SERVICES

15. Nyemaster is a law firm with experience and knowledge of bankruptcy law, including local court rules, with an office in Cedar Rapids and a broad-based practice including substantial expertise in many of the areas of federal and Iowa state law that may arise in the Chapter 11 Cases. Nyemaster has experience and knowledge in the fields of corporate real estate and tax, creditor's rights, bankruptcy law, intellectual property law, healthcare law, labor and employment, and agricultural law.

16. Attorneys and paraprofessionals of Nyemaster have expended a total of 120.10 hours in connection with this matter during the Application Period.

17. The amount of time spent by each of the professionals providing services to the Debtors for the Application Period is set forth in **Exhibit A**. As discussed in the Application, the rates reflected therein are Nyemaster's normal hourly rates of compensation for work of this character. The rates in this Application reflect a rate increase for certain of Nyemaster's attorneys that became on January 1, 2024. Nyemaster provided notice to the U.S. Trustee in accordance with the Interim Compensation Order and the U.S. Trustee did not object to such increases.

18. Nyemaster believes that the time entries, rates, and expenses included in **Exhibit A** are reasonable, customary, and in compliance with the requirements of the Bankruptcy Code and the Interim Compensation Order.

DISCUSSION

19. Section 330(a) of the Bankruptcy Code provides, in pertinent part, that:

[T]he court may award . . . reasonable compensation for actual, necessary services rendered by the . . . attorney and by any paraprofessional person . . . and . . . reimbursement for actual, necessary expenses. . . . In determining the amount of reasonable compensation to be awarded, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including – (A) the time spent on such services; (B) the rates charged for such services; (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under [the Bankruptcy Code]; (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed; and (E) whether the compensation is reasonable, based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title

20. The Eighth Circuit Court of Appeals has stated:

“[Reasonable] [c]ompensation . . . presumably reflects (1) the novelty and complexity of the issues, (2) the special skill and experience of counsel, (3) the quality of representation, and (4) the results obtained.”

P.A. Novelly v. Palans (In re Apex Oil Co.), 960 F.2d 728, 731–32 (8th Cir. 1992).

21. In reviewing this Application, the Court should be guided by the Eighth Circuit's instruction to ascertain whether such services were rendered and billed in accordance with the established market for legal services in similar matters:

Section 330 "is meant to encourage high standards of professional legal practice in the bankruptcy courts. . . . Bankruptcy courts must consider whether the fee awards are commensurate with fees for professional services in non-bankruptcy cases, thus providing sufficient economic incentive to practice in bankruptcy courts."

Mann v. McCombs (In re McCombs), 751 F.2d 286, 288 (8th Cir. 1984); *see also In re Continental Illinois Securities Litigation*, 962 F.2d 566, 568 (7th Cir. 1992) ("[I]t is not the function of judges in fee litigation to determine the equivalent of the medieval just price. It is so to determine what the lawyer would receive if he was selling his services in the market rather than being paid by court order.").

22. This Application complies with the fee application requirements set forth in *In re Pothoven*, 84 B.R. 579 (Bankr. S.D. Iowa 1988). The exhibits to this Application list and describe each activity, the date it was performed, the attorney or professional who performed the work, the time spent on the work, and the individual's hourly rate. *Id.* at 584. Furthermore, time and each task are broken down into tenths of an hour and individually recorded. *See Exhibit A.*

23. Nyemaster's hourly rate of compensation for attorneys and para-professionals during the Application Period range from \$ 90.00 to \$ 450.00. These rates are comparable to rates charged by other practitioners having the same amount of experience, expertise, and standing for similar services in this jurisdiction. Nyemaster consistently and consciously made reasonable efforts to represent the Debtors in the most economical, efficiently, and practical manner possible.

24. Each individual that billed time on these cases has experience specifically qualifying them for their participation in these Chapter 11 Cases. As set forth in *Pothoven*,

Nyemaster has provided “a description of each professional for whom compensation is sought,” including their years and areas of practice. *Pothoven*, 84 B.R. at 584.

25. In accordance with the factors enumerated in Bankruptcy Code section 330, Nyemaster submits that the amount requested is fair and reasonable given (a) the complexity of the Chapter 11 case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under this title.

26. The fees charged by Nyemaster in this case are billed in accordance with its existing billing rates and procedures set forth in the Nyemaster Application, in effect during the Application Period.

27. Nyemaster’s rates for the services rendered by its attorneys and paraprofessionals in these Chapter 11 Cases are the same rates that Nyemaster charges for services rendered in comparable matters. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable cases in a competitive national legal market.

28. Nyemaster reserves the right to correct, amend, or supplement this Application, including, without limitation, to seek payment in the event this Application is not approved in full.

NO PRIOR REQUEST

29. No prior request for the relief sought in the Application has been made to this or any other court.

[Remainder of Page Intentionally Left Blank]

WHEREFORE, Nyemaster respectfully requests that the Court enter an order: (i) awarding Nyemaster allowance of (a) eighty percent (80%) of the fees for the Application Period in the amount of \$ 30,082.40; and (b) the reimbursement of one-hundred percent (100%) of the actual and necessary expenses Nyemaster incurred during the Application Period in the amount of \$ 369.80; (ii) authorizing and directing the Debtors to pay Nyemaster \$ 30,452.20, representing the total amount owed for the Application Period; and (iii) granting such other relief as is just and proper.

Dated: July 9, 2024

NYEMASTER GOODE, P.C.

/s/ Roy Leaf

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Cedar Rapids, IA 52401-2030
Telephone: (319) 286-7002
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- and -

/s/ Kristina M. Stanger

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-and -

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Counsel for Debtors and Debtors-in-Possession

Certificate of Service

The undersigned certifies, under penalty of perjury, that on this July 9, 2024, the foregoing document was electronically filed with the Clerk of Court using the Northern District of Iowa CM/ECF and the document was served electronically through the CM/ECF system to the parties of this case

/s/ Meagan B. Breckenridge

EXHIBIT A

July 2, 2024 Invoices for May Services

Matter	Invoice #
3013788-0001	935505
3013788-0003	935506
3013788-0004	936607
3013788-0005	936608
3013788-0006	935509
3013788-0008	935510
3013788-0009	935511
3013788-0010	935512
3013788-0011	935513
3013788-0012	935514



Mercy Iowa City (Bankruptcy)
500 East Market Street
Iowa City, IA 52245

Invoice No. 935505
Invoice Date: July 2, 2024
Client ID: 3013788
Matter ID: 0001
Billing Attorney: RRL

Current Billing: **\$12,144.80**

Amount Remitted: \$ _____

Thank you for the opportunity to be of service.

The Corporate Transparency Act (CTA) takes effect January 1, 2024 and requires certain entities to report information to the Treasury Department's Financial Crimes Enforcement Network, including beneficial ownership information. To find out if your business might be affected, visit the Corporate Transparency Act Information Hub on our website (nyemaster.com) or speak with your Nyemaster attorney.

ACCOUNT AGING

Current	Under 60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Due
\$12,144.80	\$2,187.80	\$2,516.70	\$2,215.60	\$15,270.90	\$34,335.80

REMITTANCE COPY

Kindly Remit Payment Upon Receipt

Please Make Checks Payable to "Nyemaster Goode, P.C."

ACH or wire payment also accepted

Please Note: New ACH Instructions

Routing Number: [REDACTED]

Account Number: [REDACTED]



Mercy Iowa City (Bankruptcy)
500 East Market Street
Iowa City, IA 52245

Client ID: 3013788 Matter ID: 0001
RE: CASE ADMINISTRATION

RRL
Invoice No. 935505
Invoice Date July 2, 2024

FOR PROFESSIONAL SERVICES RENDERED THROUGH May 31, 2024

Date	TKPR	Hours	Narrative	Amount
05/01/24	RRL	0.60	Correspondence with counsel for Mercy Cedar Rapids re: Thompson Trust updates (.3); Correspondence with D. Simon and M. Toney re: same (.1); Correspondence with J. Porter re: extension of Sedgwick contract (.1); Correspondence with J. Porter re: insurance agreement question for Sisters of Mercy (.1).	207.00
05/02/24	RRL	1.50	Calls to Court re: PRA Order and withdrawing same (.2); Participate in call with D. Simon and E. Keil re: confirmation hearing, pension, and plan issues (.7); Follow up correspondence with P. Roby and M. Ross re: pension plan issues (.1); Call with Mercy patient re: notice received (.1); Call with E. Keil re: continuing pension issues and next steps (.3); Correspondence with Epiq re: returning call received re: confirmation hearing notice (.1).	517.50
05/03/24	RRL	1.90	Participate in call with P. Brubaker, M. Toney, and J. Holdvogt re: pension termination contingency planning (.5); Follow up call with D. Simon re: same, confirmation issues and strategy re: same (.1); Call with E. Keil re: changes to plan, other issues related to pension issues (.4); Correspond with Epiq re: calls received on confirmation hearing notice (.2); Calls with patients receiving confirmation hearing notice (.2); Call with S. Carney re: filings and case issues (.1); Call to chambers re: hearing on Thompson Trust (.1); Call with counsel for Thompson Trust re: review of documents (.3).	655.50
05/06/24	RRL	0.70	Call with T. Clancy re: status of confirmation, plan (.2); Multiple calls with Mercy pensioners re: provisional ballots received (.3); Multiple calls with Mercy patients re: confirmation hearing notice (.1); Correspondence with M. Toney, D. Simon, and E. Keil re: update on discussions with Pension Committee on pension plan issues and go forward administration (.1).	241.50

Nyemaster Goode, P.C.

Client ID: 3013788 Matter ID: 0001

Page: 3

Date	TKPR	Hours	Narrative	Amount
05/07/24	RRL	1.90	Participate in confirmation strategy and post-effective date meeting with M. Toney, J. Porter, E. Keil, and F. Perlman (.8); Correspondence with E. Keil and D. Simon re: same (.1); Calls with multiple pensioners re: late filed ballots and questions re: same (.5); Correspondence with pensioner re: same (.1); Correspondence with P. Roby re: same (.1); Correspondence with Committee, Bondholders, and Pension Committee professionals re: confirmation hearing planning call (.1); Correspondence with S. Carney and K. Stanger re: hearing coverage moving forward in case and related issues (.2); .	655.50
05/08/24	RRL	1.70	Participate in call with Pension Committee representatives and their pension counsel re: questions on go forward pension plan (.3); Follow up call with P. Roby re: same (.1); Follow up correspondence with E. Keil, M. Toney, and D. Simon (.2); Participate in call with E. Keil re: confirmation hearing pleadings and strategy, Thompson Trust motion, and liquidating trust issues (.6); Correspondence with McDermott team re: all-counsel call to discuss confirmation hearing issues (.1); Calls with multiple pensioners re: provisional ballots received (.3); Review general case correspondence on confirmation issues and order (.1).	586.50
05/09/24	RRL	1.90	Calls with multiple pensioners re: ballots received (.2); Multiple calls with E. Keil re: confirmation brief strategy, pension issues, voting certification, and other case issues (.8); Call and correspond with counsel for Sisters of Mercy re: pension status and related issues (.4); Correspondence with counsel for MercyOne, Concerned Pensioners re: witness for confirmation hearing (.2); Correspondence with patient re: notice received and Epiq re: removing person from notice list (.2); Correspond with K. Borodkin re: monthly operating reports (.1).	655.50
05/10/24	RRL	0.10	Call with patient receiving confirmation notice.	34.50
05/13/24	RRL	2.10	Participate in call with counsel for major constituents re: confirmation hearing planning (.2); Call with D. Simon, E. Keil, and M. Toney re: confirmation hearing prep and Toney declaration (.9); Correspondence with E. Keil, M. Toney, and D. Simon re: same (.3); Call with E. Keil re: confirmation hearing planning, confirmation pleadings and related issues, and pension updates (.3); Correspondence with Pension Committee professionals re: go forward pension updates (.1); Call with P. Brubaker re: pension issues and questions (.2); Review changes to plan and correspondence with major stakeholders re: same (.1).	724.50

Nyemaster Goode, P.C.

Client ID: 3013788 Matter ID: 0001

Page: 4

Date	TKPR	Hours	Narrative	Amount
05/14/24	RRL	0.70	Call with E. Keil re: confirmation hearing, pension, and other case issues (.3); Correspondence with E. Keil re: same (.1); Correspondence with ToneyKorf team re: request related to 401(k) wind down (.1); Correspond with individual re: same (.1); Correspond with client, S. Hinz re: vehicle surrender forms for leases (.1); Correspond with US Attorney re: counsel for University (.1).	241.50
05/15/24	RRL	2.10	Participate in confirmation hearing witness prep call with M. Toney, D. Simon, E. Keil, and N. Bull (1.0); Calls with M. Toney re: confirmation hearing issues and pension issues (.2); Call with H. Israel re: sisters of mercy and pension issues (.1); Follow up correspondence with H. Israel, P. Roby,, D. Simon, and E. Keil re: changes to confirmation order (.3); Correspondence with UCC and Bondholders re: same (.1); Correspondence with F. Perlman and M. Toney re: hearing prep (.1); Draft update email to ToneyKorf team re: pension continuation and JV Interest (.2); Correspondence with opposing counsel, client re: return of leased Hyundai vehicles (.1).	724.50
05/16/24	RRL	7.00	Participate in confirmation hearing (4.1); Prepare notes, research, and materials for same (.7); Meet with F. Perlman, D. Simon, and M. Toney to discuss preparations for and various issues related to same (1.6); Follow up meeting with same to discuss case next steps (.4); Call with P. Roby re: language in confirmation order and Sisters of Mercy language and attention to correspondence re: same (.2).	2,415.00
05/17/24	RRL	0.50	Call with North Scott Paper re: notice received (.1); Correspondence with client, US Trustee re: UST fee check issues (.2); Correspondence with counsel for Sisters of Mercy re: confirmation hearing update (.2).	172.50
05/20/24	RRL	0.50	Call with creditor re: payment of Mercy invoices (.1); Update email to Mercy Service's Board member re: confirmation (.1); Attention to correspondence re: Eastern Iowa Rehab and T. Clancey resignation (.1); Call with C. Karambelas re: leased vehicle issues (.2).	172.50
05/21/24	RRL	1.00	Participate in call with Principal re: status of pension plan (.6); Follow up call with K. Stanger re: same (.1); Correspondence with McDermott team re: same (.1); Correspondence with counsel for Sisters of Mercy and K. Stanger re: same (.2).	345.00
05/22/24	RRL	0.30	Call with pensioner re: change of address and follow up correspondence with B. Brubaker re: same (.1); Review correspondence re: next steps for pension transfer with Sisters of Mercy counsel (.1); Update emails with M. Toney re: same, confirmation order (.1).	103.50

Nyemaster Goode, P.C.

Client ID: 3013788 Matter ID: 0001

Page: 5

Date	TKPR	Hours	Narrative	Amount
05/23/24	RRL	0.40	Call with pensioner re: status of pension plan (.2); Correspondence with D. Simon and E. Keil re: tasks for consummation of plan (.2).	138.00
05/24/24	RRL	1.40	Correspondence with J. Porter and M. Toney re: tasks needed for effective date (.4); Correspondence with UCC, Pension Committee, and Bondholders re: liquidation trust agreement (.2); Correspondence with E. Keil re: same (.1); Review same (.2); Correspond with M. Ross and P. Roby re: pension administrator agreement (.1); Correspond with J. Porter re: questions on tax issues and review same (.2); Review correspondence re: MercyOne issues and correspondence with McDermott team re: same (.2).	483.00
05/28/24	RRL	0.50	Call with E. Keil re: effective date tasks and updates re: confirmation (.2); Call to chambers re: hearing dates for sale motion (.1); Call with P. Roby re: liquidation trust agreement (.1); Follow up correspondence with stakeholders re: same (.1).	172.50
05/29/24	RRL	1.50	Correspondence with K. Stanger re: pension discussions with Principal (.2); Correspondence with H. Israel re: Sisters of Mercy status and pension (.1); Correspondence with J. Porter re: administrative claims waterfall review, funding, and plan issues re: same (.4); Review plan and related provisions for effective date distributions per questions from J. Porter (.5); Correspondence with N. Coco re: status update on plan confirmation (.1); Correspondence with M. Toney re: same (.2).	517.50
05/29/24	KMS	0.10	Attention to response from Insurance Division approving payment of expenses to Sedgwick from Hills Bank SIR account.	45.00
05/30/24	RRL	3.80	Correspond with J. Porter and E. Keil re: call to discuss effective date distributions and questions related to same under plan (.2); Call with J. Porter re: same (.5); Call with E. Keil re: same (.1); Correspondence with E. Keil, J. Porter, M. Toney, and D. Simon re: same (.2); Correspondence with R. Gainer and P. Roby re: Thompson Trust sale hearing and call to discuss same (.2); Prepare argument for Progressive Rehab telephonic hearing and analyze Progressive reply re: same (1.3); Call with H. Israel re: Sisters of Mercy and pension issues (.3); Follow up correspondence with M. Toney, K. Stanger, F. Perlman, and D. Simon re: update on same, next steps (.3); Follow up correspondence with K. Stanger re: same (.1); Call with C. Karambelas re: issues related to administrative claims and payment on same (.3); Correspondence with C. Karambelas re: Mercy Hospital corporate organization documents for pension issues and resolution (.2); Call with Mercy patient re: notice received (.1).	1,311.00

Nyemaster Goode, P.C.

Client ID: 3013788 Matter ID: 0001

Page: 6

Date	TKPR	Hours	Narrative	Amount
05/31/24	RRL	1.90	Prepare for and participate in hearing re: Progressive Rehab motion (1.0); Update email to client, McDermott team re: same (.2); Correspond with C. Karambelas re: Mercy Hospital corporate org documents (.1); Correspondence with Mercy patient re: notice received and Epiq re: same (.2); Call with P. Roby and R. Gainer re: Thompson Trust issues and other case issues (.5); Follow up correspondence with same (.1).	655.50
Sub-Total Fees:				11,775.00

SUMMARY OF PROFESSIONAL SERVICES

PROFESSIONAL	HOURS	HOURLY RATE	AMOUNT
Roy R. Leaf	34.00	345.00	11,730.00
Kristina M. Stanger	0.10	450.00	45.00
	34.10		11,775.00

DISBURSEMENTS

05/01/2024	SKC	VENDOR: Gannett Iowa LocaliQ; INVOICE#: 0006387929; DATE: 5/1/2024 - Fee for Publication in the Des Moines Register	187.60
05/01/2024	SKC	VENDOR: Gannett Iowa LocaliQ; INVOICE#: 0006387929; DATE: 5/1/2024 - Fee for Publication in the Iowa City Press Citizen	182.20
Sub-Total Disbursements:			369.80

TOTAL CURRENT BILLING: \$ 12,144.80

ACCOUNT SUMMARY

Previous Balance:		\$	41,204.94
Payments			
06/04/24	Mercy Hospital		<10,066.80>
06/25/24	Mercy Iowa City (Bankruptcy)		<8,947.14>
Current Billing:		\$	<u>12,144.80</u>
TOTAL DUE:		\$	34,335.80

Outstanding Invoice Summary

Bill #	Bill Date	Bill Amount	Amount Due
918584	09/28/23	16,753.50	2,307.90
920136	10/26/23	28,459.61	4,241.20
921643	11/20/23	31,918.80	6,515.40
923060	12/14/23	7,359.11	1,430.10
925499	01/29/24	3,881.50	776.30

Nyemaster Goode, P.C.

Client ID: 3013788 Matter ID: 0001

Page: 7

929471	04/02/24	11,348.23	2,215.60
931305	04/29/24	12,583.50	2,516.70
932912	05/21/24	11,134.94	2,187.80



Mercy Iowa City (Bankruptcy)
500 East Market Street
Iowa City, IA 52245

Invoice No. 935506
Invoice Date: July 2, 2024
Client ID: 3013788
Matter ID: 0003
Billing Attorney: RRL

Current Billing: **\$873.50**

Amount Remitted: \$ _____

Thank you for the opportunity to be of service.

The Corporate Transparency Act (CTA) takes effect January 1, 2024 and requires certain entities to report information to the Treasury Department's Financial Crimes Enforcement Network, including beneficial ownership information. To find out if your business might be affected, visit the Corporate Transparency Act Information Hub on our website (nyemaster.com) or speak with your Nyemaster attorney.

ACCOUNT AGING

Current	Under 60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Due
\$873.50	\$101.90	\$81.40	\$219.60	\$2,501.60	\$3,778.00

REMITTANCE COPY

Kindly Remit Payment Upon Receipt

Please Make Checks Payable to "Nyemaster Goode, P.C."

ACH or wire payment also accepted

Please Note: New ACH Instructions

Routing Number: [REDACTED]

Account Number: [REDACTED]



Mercy Iowa City (Bankruptcy)
500 East Market Street
Iowa City, IA 52245

Client ID: 3013788 Matter ID: 0003
RE: EMPLOYMENT AND FEE APPLICATIONS (NYEMASTER)

RRL
Invoice No. 935506
Invoice Date July 2, 2024

FOR PROFESSIONAL SERVICES RENDERED THROUGH May 31, 2024

Date	TKPR	Hours	Narrative	Amount
05/01/24	DWH	0.50	Draft Eighth Monthly Application for Compensation of Nyemaster.	137.50
05/02/24	DWH	0.10	Continue drafting Nyemaster's eighth monthly application for compensation.	27.50
05/02/24	RRL	0.10	Correspondence with D. Hempy re: preparation of March Nyemaster fee application.	34.50
05/03/24	DWH	1.00	Continue drafting Nyemaster's eighth monthly application for compensation.	275.00
05/06/24	DWH	0.60	Continue drafting Nyemaster's eighth monthly fee application.	165.00
05/13/24	RRL	0.10	Correspond with D. Hempy re: final fee application.	34.50
05/16/24	RRL	0.10	Correspondence with D. Hempy re: final fee application timing and preparation of same.	34.50
05/30/24	DWH	0.40	Draft application for compensation for Nyemaster Goode for April 2024 fees and expenses.	110.00
05/31/24	DWH	0.20	Continue drafting Nyemaster ninth fee application.	55.00
Sub-Total Fees:				873.50

SUMMARY OF PROFESSIONAL SERVICES

PROFESSIONAL	HOURS	HOURLY RATE	AMOUNT
Dana W. Hempy	2.80	275.00	770.00
Roy R. Leaf	0.30	345.00	103.50
	3.10		873.50

TOTAL CURRENT BILLING: \$ 873.50

Nyemaster Goode, P.C.

Client ID: 3013788 Matter ID: 0003

Page: 3

ACCOUNT SUMMARY

Previous Balance:		\$	3,637.70
Payments			
06/04/24	Mercy Hospital		<325.60>
06/25/24	Mercy Iowa City (Bankruptcy)		<407.60>
Current Billing:		\$	873.50
TOTAL DUE:		\$	3,778.00

Outstanding Invoice Summary

Bill #	Bill Date	Bill Amount	Amount Due
918576	09/28/23	4,892.50	978.50
920293	10/31/23	3,471.00	694.20
921623	11/17/23	1,283.50	256.70
923063	12/14/23	1,230.00	246.00
925503	01/29/24	641.00	128.20
927147	02/26/24	989.50	198.00
929463	04/02/24	1,098.00	219.60
931307	04/29/24	407.00	81.40
932913	05/21/24	509.50	101.90



Mercy Iowa City (Bankruptcy)
500 East Market Street
Iowa City, IA 52245

Invoice No. 935507
Invoice Date: July 2, 2024
Client ID: 3013788
Matter ID: 0004
Billing Attorney: RRL

Current Billing: **\$517.50**

Amount Remitted: \$ _____

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ACCOUNT AGING

Current	Under 60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Due
\$517.50	\$172.50	\$262.20	\$212.50	\$2,846.40	\$4,011.10

REMITTANCE COPY

Kindly Remit Payment Upon Receipt

Please Make Checks Payable to "Nyemaster Goode, P.C."

ACH or wire payment also accepted

Please Note: New ACH Instructions

Routing Number: [REDACTED]

Account Number: [REDACTED]



Mercy Iowa City (Bankruptcy)
500 East Market Street
Iowa City, IA 52245

Client ID: 3013788 Matter ID: 0004
RE: EMPLOYMENT AND FEE APPLICATIONS (OTHERS)

RRL
Invoice No. 935507
Invoice Date July 2, 2024

FOR PROFESSIONAL SERVICES RENDERED THROUGH May 31, 2024

Date	TKPR	Hours	Narrative	Amount
05/01/24	RRL	0.20	Correspondence with E. Keil re: ordinary course professional issues (.1); Correspond with attorney for Cipriani firm re: ordinary course professional declaration (.1).	69.00
05/02/24	RRL	0.20	Correspondence with E. Keil re: filing McDermott fee applications (.1); Attention to fee application filed by M. Ross (.1).	69.00
05/06/24	RRL	0.10	Correspondence with A. Peiffer re: H2C retention order and fees.	34.50
05/07/24	RRL	0.20	Correspondence and call with A. Peiffer re: status of objection to H2C fee application and questions re: same.	69.00
05/09/24	RRL	0.20	Call with counsel for H2C re: status of fee objection and hearing re: same.	69.00
05/15/24	RRL	0.30	Call and correspond with D. Orman re: H2C fee application (.2); Correspond with J. Houk re: same and review same (.1).	103.50
05/16/24	RRL	0.30	Correspondence with A. Peiffer re: proposed order for H2C application (.1); Correspondence with counsel for Hall Render re: final fee application (.1); Correspond with K. Borodkin re: payment of same (.1).	103.50

Sub-Total Fees: 517.50

SUMMARY OF PROFESSIONAL SERVICES

PROFESSIONAL	HOURS	HOURLY RATE	AMOUNT
Roy R. Leaf	1.50	345.00	517.50
	1.50		517.50

TOTAL CURRENT BILLING: \$ 517.50

Nyemaster Goode, P.C.

Client ID: 3013788 Matter ID: 0004

Page: 3

ACCOUNT SUMMARY

Previous Balance:		\$	5,232.40
Payments			
06/04/24	Mercy Hospital		<1,048.80>
06/25/24	Mercy Iowa City (Bankruptcy)		<690.00>
Current Billing:		\$	517.50
TOTAL DUE:		\$	4,011.10

Outstanding Invoice Summary

Bill #	Bill Date	Bill Amount	Amount Due
918582	09/28/23	1,976.50	395.30
920294	10/31/23	2,827.50	565.50
921624	11/17/23	689.00	137.80
923065	12/14/23	2,302.00	460.40
925500	01/29/24	1,451.00	290.20
927148	02/26/24	4,986.00	997.20
929464	04/02/24	1,062.50	212.50
931308	04/29/24	1,311.00	262.20
932914	05/21/24	862.50	172.50



Mercy Iowa City (Bankruptcy)
500 East Market Street
Iowa City, IA 52245

Invoice No. 935508
Invoice Date: July 2, 2024
Client ID: 3013788
Matter ID: 0005
Billing Attorney: RRL

Current Billing: **\$172.50**

Amount Remitted: \$ _____

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ACCOUNT AGING

Current	Under 60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Due
\$172.50	\$13.80	\$13.80	\$55.20	\$1,258.90	\$1,514.20

REMITTANCE COPY

Kindly Remit Payment Upon Receipt

Please Make Checks Payable to "Nyemaster Goode, P.C."

ACH or wire payment also accepted

Please Note: New ACH Instructions

Routing Number: [REDACTED]

Account Number: [REDACTED]



Mercy Iowa City (Bankruptcy)
500 East Market Street
Iowa City, IA 52245

Client ID: 3013788 Matter ID: 0005
RE: CASH COLLATERAL AND DIP FINANCING

RRL
Invoice No. 935508
Invoice Date July 2, 2024

FOR PROFESSIONAL SERVICES RENDERED THROUGH May 31, 2024

Date	TKPR	Hours	Narrative	Amount
05/02/24	RRL	0.10	Review correspondence with D. Simon and N. Coco re: final cash collateral order.	34.50
05/03/24	RRL	0.40	Correspond with K. Borodkin re: updated budget figures for cash collateral budget (.1); Correspond with Secured Bondholder representatives re: same (.1); Correspond with accounting for Nyemaster for numbers for cash collateral budget and calculate same (.2).	138.00

Sub-Total Fees: 172.50

SUMMARY OF PROFESSIONAL SERVICES

PROFESSIONAL	HOURS	HOURLY RATE	AMOUNT
Roy R. Leaf	0.50	345.00	172.50
	0.50		172.50

TOTAL CURRENT BILLING: \$ 172.50

ACCOUNT SUMMARY

Previous Balance:	\$	1,452.10
Payments		
06/04/24 Mercy Hospital		<55.20>
06/25/24 Mercy Iowa City (Bankruptcy)		<55.20>
Current Billing:	\$	<u>172.50</u>
TOTAL DUE:	\$	1,514.20

Outstanding Invoice Summary

Bill #	Bill Date	Bill Amount	Amount Due
918580	09/28/23	413.00	82.60
920295	10/31/23	613.00	122.60
921625	11/17/23	4,354.00	870.80

Nyemaster Goode, P.C.

Client ID: 3013788 Matter ID: 0005

Page: 3

923067	12/14/23	914.50	182.90
929465	04/02/24	276.00	55.20
931309	04/29/24	69.00	13.80
932915	05/21/24	69.00	13.80



Mercy Iowa City (Bankruptcy)
500 East Market Street
Iowa City, IA 52245

Invoice No. 935509
Invoice Date: July 2, 2024
Client ID: 3013788
Matter ID: 0006
Billing Attorney: RRL

Current Billing: **\$16,798.50**

Amount Remitted: \$ _____

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ACCOUNT AGING

Current	Under 60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Due
\$16,798.50	\$1,951.80	\$2,211.30	\$3,295.20	\$14,266.10	\$38,522.90

REMITTANCE COPY

Kindly Remit Payment Upon Receipt

Please Make Checks Payable to "Nyemaster Goode, P.C."

ACH or wire payment also accepted

Please Note: New ACH Instructions

Routing Number: _____

Account Number: _____



Mercy Iowa City (Bankruptcy)
500 East Market Street
Iowa City, IA 52245

Client ID: 3013788 Matter ID: 0006
RE: PREPARATION AND REVIEW OF CASE PLEADINGS

RRL
Invoice No. 935509
Invoice Date July 2, 2024

FOR PROFESSIONAL SERVICES RENDERED THROUGH May 31, 2024

Date	TKPR	Hours	Narrative	Amount
05/01/24	SKC	0.30	Review and finalize for filing Declaration re: Ordinary Course Professional, Daniel Haier of Cipriani & Werner.	27.00
05/01/24	SKC	0.10	Review of Motion to Withdraw of Assistant Attorney General Jeffrey C. Peterzalek.	9.00
05/01/24	SKC	0.30	Finalized for filing Notice of Third Quarterly Statement of Amounts Paid to Ordinary Course Professionals for the Quarter Ending March 31, 2024.	27.00
05/01/24	RRL	1.60	Review and revise ordinary course professional notices for filing (.2); Correspondence with E. Keil re: same (.1); Correspondence with S. Carney re: filing same (.2); Continue drafting resistance to PRA motion (.9); Prepare two OCP declarations for filing (.1); Correspondence with K. Borodkin re: same (.1).	552.00
05/02/24	SKC	0.30	Revise and edit for filing with Court Notice of Further Revised List of Ordinary Course Professionals and setting bar date for objections.	27.00
05/02/24	SKC	0.30	Review and finalized for filing Declaration of Ordinary Course Professional - Kimberley Maser, Controller of Mercy Hospital.	27.00
05/02/24	SKC	0.10	Review of Order Granting Progressive Rehabilitation Associates' Motion for Payment of Ordinary Course Invoices.	9.00
05/02/24	SKC	0.20	Review of Fifth Application for Compensation for HBM Management Associates, LLC, Other Professional 4/1/2024 - 4/28/2024.	18.00
05/02/24	SKC	0.10	Review of Notice Setting Bar Date for Objections Re: Application for Compensation - Fifth Interim for HBM Management Associates Filed by HBM Management Associates, LLC.	9.00

Nyemaster Goode, P.C.

Client ID: 3013788 Matter ID: 0006

Page: 3

Date	TKPR	Hours	Narrative	Amount
05/02/24	SKC	0.40	Review and finalize for filing Joint Motion for Entry of Consent Order (I) Vacating Order Granting the PRA Motion and (II) Setting the PRA Motion for Hearing and finalize and prepare Exhibit A to Joint Motion.	36.00
05/02/24	SKC	0.30	Edit and prepare for filing Exhibit and Witness List for May 16, 2024 Hearing.	27.00
05/02/24	SKC	0.10	Receipt and review of Exhibit List for May 16, 2024 Hearing filed by Creditor Committee of Unsecured Creditors.	9.00
05/02/24	RRL	2.00	Draft motion to withdraw PRA Order and proposed order re: same (1.2); Correspondence with D. Childers and Court re: same (.3); Correspond with S. Carney re: filing same (.1); Draft witness and exhibit list (.3); Correspond with S. Carney re: filing same (.1).	690.00
05/03/24	SKC	0.10	Review of Exhibit List for 5/16/2024 Hearing and Witness List Filed by Creditor Catholic Health Initiatives-Iowa Corp; Mercy ACO, LLC; Mercy Clinics, Inc.; Mercy College of Health Sciences; and MHN ACO, LLC.	9.00
05/03/24	SKC	0.20	Review of Consent Order granting Joint Motion for Entry of Consent Order (I) Vacating Order Granting the PRA Motion and (II) Setting the PRA Motion for Hearing.	18.00
05/03/24	SKC	0.10	Review of Withdrawal of Claim # Filed by US DHHS - HRSA claim number 10359 Filed by Epiq Corporate Restructuring.	9.00
05/03/24	RRL	2.40	Review PRA Payment Motion withdrawal motion and correspond with assistant re: docketing same (.1); Continue drafting resistance to PRA Payment Motion (2.3).	828.00
05/06/24	SKC	0.20	Review of Motion from Relief from Stay of Hyundai Lease Titling Trust.	18.00
05/06/24	SKC	0.10	Review of Statement of Corporate Ownership filed. Corporate parents added to case: Hyundai Motor America, Kia Motors America, Inc.. Filed by Creditor Hyundai Capital America (HCA) servicing agent of Hyundai Lease Titling Trust.	9.00
05/06/24	SKC	0.20	Review of Objection to Confirmation of Plan Combined Disclosure Statement and Joint Chapter 11 Plan of Liquidation Filed by Mercy Health Network.	18.00
05/06/24	SKC	0.50	Review and edit for filing Application for Compensation of McDermott Will & Emery, LLP, Counsel to Debtors for Mercy Hospital, Iowa City, Iowa, Debtor's Attorney 3/1/2024 - 3/31/2024.	45.00

Nyemaster Goode, P.C.

Client ID: 3013788 Matter ID: 0006

Page: 4

Date	TKPR	Hours	Narrative	Amount
05/06/24	SKC	0.20	Review and edit for filing Notice of Setting Bar Date re: Application for Compensation of McDermott Will & Emery, LLP, Counsel to Debtors for Mercy Hospital, Iowa City, Iowa, Debtor's Attorney 3/1/2024 - 3/31/2024.	18.00
05/06/24	SKC	0.60	Review and edit for filing Application for Compensation of Nyemaster Goode, PC, Counsel to Debtors for Mercy Hospital, Iowa City, Iowa, Debtor's Attorney 3/1/2024 - 3/31/2024.	54.00
05/06/24	SKC	0.30	Review and edit for filing Notice Setting Bar Date re Application for Compensation of Nyemaster Goode, PC, Counsel to Debtors for Mercy Hospital, Iowa City, Iowa, Debtor's Attorney 3/1/2024 - 3/31/2024.	27.00
05/06/24	RRL	4.70	Review and revise draft confirmation order (2.2); Correspondence with E. Keil re: same (.1); Review Hyundai lift stay motion and correspond with E. Keil re: same (.2); Correspond with C. Karambelas re: same (.1); Review MercyOne, PRA, and pensioner objections to plan (.4); Correspond with E. Keil and M. Toney re: same (.2); Correspond with D. Childers re: PRA objection (.1); Complete draft of resistance to PRA motion (1.0); Draft notice for Nyemaster 8th fee application (.1); Correspond with D. Hempy re: Nyemaster fee application and review same (.2); Correspond with S. Carney re: filing Nyemaster and McDermott fee applications (.1).	1,621.50
05/07/24	SKC	0.20	Review and docket Motion for Preliminary Relief from Stay Hearing Order.	18.00
05/07/24	SKC	0.20	Receipt and review of Application for Compensation Sills Cummis & Gross, P.C. for Official Committee of Unsecured Creditors and Notice Setting Bar Date for Objections Re: Application for Compensation - Sills Cummis & Gross, P.C. Filed by Official Committee of Unsecured Creditors.	18.00
05/07/24	SKC	0.10	Receipt and review of Motion to Appear pro hac vice - Benjamin E. Shook Filed by H2C Securities, Inc. and Appearance by Austin Peiffer Filed by Financial Advisor H2C Securities, Inc..	9.00
05/07/24	SKC	0.10	Receipt and docket of Order Setting Hearing 5/16/24.	9.00
05/07/24	RRL	1.40	Proof and finalize PRA objection for filing (.4); Correspond with E. Keil and D. Simon re: same (.1); Correspond with S. Carney re: same (.1); Correspond with counsel for Hyundai re: lift stay motion (.2); Review and revise lift stay order in accordance with local rules (.3); Correspondence with Committee counsel re: same (.1); Correspondence with P. Chalik re: PRA resistance (.1); Correspondence with K. Stanger re: confirmation order (.1).	483.00

Nyemaster Goode, P.C.

Client ID: 3013788 Matter ID: 0006

Page: 5

Date	TKPR	Hours	Narrative	Amount
05/08/24	RRL	7.10	Correspond with court and counsel for Hyundai re: stipulated relief from stay (.3); Correspond with client re: same (.1); Prepare and finalize stipulation (.1); Finalize Thompson Trust motion (6.1); Correspond with counsel for Mercy Cedar Rapids re: same (.1); Correspond with E. Keil re: same (.1); Continue drafting Leaf Declaration in support of same (.3).	2,449.50
05/08/24	SKC	0.20	Review of Objection re: Motion for Payment by Progressive Rehabilitation Associates for filing with Court.	18.00
05/08/24	SKC	0.20	Review of Stipulated Order Modifying the Automatic Stay as to Hyundai Lease Titling Trust and Response re: Objection, Objection Filed by Creditor Ag & Business Legal Strategies.	18.00
05/08/24	SKC	0.20	Review of Report on Ballots Filed by Debtor Mercy Hospital, Iowa City, Iowa and Application for Compensation FTI Consulting, Inc. for Official Committee of Unsecured Creditors and Notice Setting Bar Date for Objections.	18.00
05/09/24	RRL	1.60	Correspondence with Mercy Cedar Rapids counsel re: Thompson motion (.1); Finalize declaration for same (.4); Prepare exhibits for same (.5); Call with chambers re: Thompson hearing date (.1); Review and revise sale notice (.2); Review and finalize for filing voting certification (.2); Review MercyOne exhibit list objection (.1).	552.00
05/10/24	RRL	3.70	Review comments from E. Keil to Thompson Trust motion and order (.3); Revise Thompson Trust motion and proposed order per comments from E. Keil (.9); Finalize Thompson Trust pleadings for filing (.3); Correspond with Epiq re: service instructions for Thompson Trust motion and provide addresses of same (.3); Review and provide comments to Toney declaration (1.7); Correspond with E. Keil re: same (.2).	1,276.50
05/12/24	RRL	1.70	Review confirmation hearing brief and provide comments to same (1.5); Correspond with E. Keil re: same (.2).	586.50
05/13/24	SKC	0.20	Receipt and Review of Objection to Exhibits re: Exhibit List Filed by Creditor Mercy Health Network, Inc.	18.00
05/13/24	SKC	0.10	Review of Notice of Appearance and Request for Notice by Benjamin E. Shook filed by Financial Adviser H2C Securities.	9.00
05/13/24	SKC	0.10	Review of Response re: Objection to H2C's First Fee Application Filed by Financial Advisor H2C Securities, Inc. and Exhibit.	9.00
05/13/24	RRL	1.30	Review H2C reply to UST fee objection (.1); Begin drafting motion to assume executory contracts (1.2).	448.50

Nyemaster Goode, P.C.

Client ID: 3013788 Matter ID: 0006

Page: 6

Date	TKPR	Hours	Narrative	Amount
05/14/24	SKC	0.10	Review of Withdrawal of Document re: Objection to Confirmation of the Plan Filed by J. Nicholas Russo, Nancy Russo, Brent Strabala.	9.00
05/14/24	SKC	0.50	Review and finalized for filing Brief - Debtors' (I) Memorandum of Law in Support of Confirmation of Debtors' First Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Liquidation and (II) Omnibus Reply to Objections to Confirmation.	45.00
05/14/24	SKC	0.40	Review and finalize for filing Modified Chapter 11 Plan of Liquidation and Exhibits A and B.	36.00
05/14/24	SKC	0.40	Review and edit for filing Notice of Filing of Proposed Findings of Fact, Conclusions of Law, and Order Confirming Debtors' First Amended Joint Plan of Liquidation.	36.00
05/14/24	SKC	0.30	Telephone conference with Clerk regarding procedures for filing Modified Plan.	27.00
05/14/24	SKC	0.30	Prepare for filing Debtors' Amended Witness and Exhibit List for May 16, 2024 Hearing. .	27.00
05/14/24	RRL	1.40	Draft amended witness and exhibit list and correspond with S. Carney re: filing same (.2); Calls with clerk re: filing plan (.1); Discuss same with S. Carney (.1); Review and revise notice of amended plan and confirmation order (.2); Review final version of Toney Declaration, Confirmation Order, Plan, and Confirmation Brief and send same to S. Carney for filing (.5); Correspond with E. Keil re: filings for confirmation hearing (.2); Correspondence with M. Toney re: Toney Declaration (.1).	483.00
05/15/24	SKC	0.30	Review and file with Court Compensation Report of ToneyKorf, LLC for the Period from February 1, 2024 through March 31, 2024.	27.00
05/15/24	SKC	0.40	Review for filing Application for Compensation for Fifth Third Securities, Inc. fka H2C Securities, Inc., Financial Advisor and Investment Banker for Mercy Hospital, Iowa City, Iowa and Notice Setting Bar Date re Application for Compensation.	36.00
05/15/24	RRL	4.90	Revise confirmation order per agreement between pension committee and sisters of mercy (.1); Correspond with E. Keil and D. Simon re: same (.1); Prepare H2C fee application and notice for filing (.2); Correspond with S. Carney re: filing H2C and ToneyKorf pleadings (.1); Complete drafting motion to assume contracts, proposed order, and notice re: same (3.7); Review assumed contract list for cure amounts and correspond with C. Karambelas re: same (.7).	1,690.50

Nyemaster Goode, P.C.

Client ID: 3013788 Matter ID: 0006

Page: 7

Date	TKPR	Hours	Narrative	Amount
05/15/24	SKC	0.20	Review for filing Motion to Assume Lease or Executory Contract Filed by Mercy Hospital and Notice Setting Bar Date.	18.00
05/16/24	SKC	0.30	Correspondence from Progressive regarding Notice of Sale and Sale Hearing received and request for additional information.	27.00
05/16/24	SKC	0.10	Receipt and review of Exhibit List from May 16, 2024 Hearing.	9.00
05/16/24	RRL	0.20	Revise confirmation order in accordance with agreed Sisters of Mercy language and correspond with Court re: same.	69.00
05/17/24	SKC	0.20	Review of Proceeding Memo and Order and Order Granting Debtors' Motion for Entry of Order Modifying Local Rule 3018-1(C).	18.00
05/17/24	SKC	0.40	Correspondences to and from Michael Moore regarding Mary Knapp workers' compensation issue and follow up questions as to whether or not he has submitted necessary information to the insurance division yet.	36.00
05/17/24	RRL	0.30	Correspond with A. Peiffer re: H2C proposed order and review changes to same (.2); Research re: equitable mootness (.1).	103.50
05/20/24	SKC	0.20	Review of Order (I) Approving and Allowing Compensation for Services Rendered and for Reimbursement of Actual and Necessary Expenses Incurred by H2C Securities, Inc. from August 7, 2023 to and Including January 31, 2024 Related to the Sale Transaction.	18.00
05/20/24	RRL	0.90	Draft proposed order for Banks litigation lift stay (.5); Correspond with Banks counsel re: same (.1); Correspond with M. Toney re: ToneyKorf staffing report (.1); Review same in anticipation for filing (.1); Correspond with S. Carney re: same (.1).	310.50
05/21/24	SKC	0.30	Revisions and edits for filing to Chapter 11 Monthly Operating Report for Mercy Iowa City ACO - Case Number 23-00622 for the Month Ending: 04/30/2024.	27.00
05/21/24	SKC	0.40	Revisions and edits for filing with court to Chapter 11 Monthly Operating Report for Case Number 23-00624 for the Month Ending: 04/30/2024 for Mercy Services Iowa City, Inc..	36.00
05/21/24	SKC	0.40	Revision and edits for filing with Court of Chapter 11 Monthly Operating Report for the Month Ending: 04/30/2024 for Debtor Mercy Hospital, Iowa City, Iowa.	36.00

Nyemaster Goode, P.C.

Client ID: 3013788 Matter ID: 0006

Page: 8

Date	TKPR	Hours	Narrative	Amount
05/21/24	RRL	0.70	Review draft monthly operating reports for April (.2); Correspond with S. Carney re: filing same (.1); Correspond with US Trustees office re: supporting documents for monthly operating reports (.1); Correspondence with P. Roby, B. Gainer, and Banks counsel re: stipulated lift stay order (.3).	241.50
05/22/24	SKC	0.10	Review of Notice of Appearance and Request for Notice by Peter C. Riley Filed by Kelly Banks.	9.00
05/22/24	SKC	0.30	Conference with attorneys regarding document 1072 filed as a motion from relief from stay by Peter Riley but erroneously filed same document, the exhibit, twice with no motion.	27.00
05/22/24	SKC	0.20	Review of Motion for Relief from Stay . Filed by Kelly Banks regarding medical malpractice lawsuit and exhibits.	18.00
05/23/24	SKC	0.20	Review of Application for Compensation, Notice Setting Bar Date Notice of Corrected Invoice & Extended Objection Deadline Filed by Creditor Committee Official Committee of Unsecured Creditors.	18.00
05/23/24	SKC	0.10	Review of Consent Order Granting Relief from the Automatic Stay.	9.00
05/23/24	RRL	0.60	Review Sills Cummis notice re: fees and invoices provided (.1); Review order re: modification of stay (.1); Call with counsel for BDO re: assumption motion (.2); Revisions to proposed order and correspond with BDO counsel re: same (.2).	207.00
05/24/24	SKC	0.20	Review of Amended Application for Compensation for Official Committee of Unsecured Creditors and Notice Setting Bar Date.	18.00
05/24/24	SKC	0.30	Review of Third Application for Compensation of Counsel to Official Committee of Pensioners and Notice Setting Bar Date.	27.00
05/24/24	RRL	0.20	Review Pension Committee counsel fee request (.1); Correspond with Lifepoint counsel re: draft sale motion (.1).	69.00
05/28/24	RRL	2.70	Review draft Eastern Iowa Rehab pleadings provided by Lifepoint counsel and revise same (1.5); Begin drafting Nyemaster final fee application (1.2).	931.50
05/29/24	SKC	0.20	Review of Objection to Sell/Sale of Property by Thompson Brothers Trust.	18.00
05/29/24	SKC	0.10	Review of Notice of Appearance and Request for Notice by Kandie K Gelner Filed by Interested Party Thompson Brothers Trust.	9.00

Nyemaster Goode, P.C.

Client ID: 3013788 Matter ID: 0006

Page: 9

Date	TKPR	Hours	Narrative	Amount
05/29/24	RRL	0.80	Review and analyze objection from Thompson Trustee (.3); Correspond with M. Toney and D. Simon re: response to same (.2); Correspond with Mercy Cedar Rapids counsel re: same (.2); Correspondence with D. Hempy and E. Keil re: preparation of monthly fee statements (.1).	276.00
05/30/24	SKC	0.30	Review of Motion To Confirm No Stay of Action Filed by Ashley Kurka and Tyler Davis regarding potential malpractice.	27.00
05/30/24	SKC	0.10	Review of Reply re: Motion, Objection to Document Reply to Objection of Debtor Filed by Creditor Progressive Rehabilitation Associates, L.L.C.	9.00
05/30/24	SKC	0.10	Review of Order Granting Motion to Confirm No Stay Action.	9.00
05/30/24	SKC	0.30	Edit and finalize for filing Mercy"s Exhibit and Witness List for June 6 hearing.	27.00
05/30/24	SKC	0.20	Review of Third Application for Compensation for Attorneys for Creditor Committee and Notice Setting Bar Date.	18.00
05/30/24	SKC	0.80	Emails, telephone calls regarding upcoming June 6 hearing and docket.	72.00
05/30/24	RRL	1.30	Prepare witness and exhibit list for June 6th hearing (.3); Correspond with S. Carney re: filing same (.1); Review UCC monthly fee application (.1); Continuing analysis of Thompson Trust Trustee objection and preparation of reply to same (.8).	448.50
05/31/24	RRL	3.20	Continue research re: objection by Trustee and outline reply to same (2.9); Correspond with D. Hempy re: same (.2); Correspond with D. Hempy re: Nyemaster fee application (.1).	1,104.00

Sub-Total Fees: 16,798.50

SUMMARY OF PROFESSIONAL SERVICES

PROFESSIONAL	HOURS	HOURLY RATE	AMOUNT
Sharon K. Carney	15.30	90.00	1,377.00
Roy R. Leaf	44.70	345.00	15,421.50
	<u>60.00</u>		<u>16,798.50</u>

TOTAL CURRENT BILLING: \$ **16,798.50**

ACCOUNT SUMMARY

Previous Balance: \$ **38,376.80**
Payments

Nyemaster Goode, P.C.

Client ID: 3013788 Matter ID: 0006

Page: 10

06/04/24	Mercy Hospital	<8,845.20>
06/25/24	Mercy Iowa City (Bankruptcy)	<7,807.20>
Current Billing:		\$ <u>16,798.50</u>
TOTAL DUE:		\$ 38,522.90

Outstanding Invoice Summary

Bill #	Bill Date	Bill Amount	Amount Due
918581	09/28/23	7,213.50	1,442.70
920137	10/26/23	16,120.50	3,224.10
921627	11/17/23	7,542.00	1,508.40
923069	12/14/23	9,123.50	1,824.70
925497	01/29/24	13,477.50	2,695.50
927149	02/26/24	17,853.50	3,570.70
929466	04/02/24	16,476.00	3,295.20
931310	04/29/24	11,056.50	2,211.30
932916	05/21/24	9,759.00	1,951.80



Mercy Iowa City (Bankruptcy)
500 East Market Street
Iowa City, IA 52245

Invoice No. 935510
Invoice Date: July 2, 2024
Client ID: 3013788
Matter ID: 0008
Billing Attorney: RRL

Current Billing: **\$662.00**

Amount Remitted: \$ _____

Thank you for the opportunity to be of service.

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ACCOUNT AGING

Current	Under 60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Due
\$662.00	\$558.30	\$0.00	\$574.40	\$17,645.40	\$19,440.10

REMITTANCE COPY

Kindly Remit Payment Upon Receipt

Please Make Checks Payable to "Nyemaster Goode, P.C."

ACH or wire payment also accepted

Please Note: New ACH Instructions

Routing Number: [REDACTED]

Account Number: [REDACTED]



Mercy Iowa City (Bankruptcy)
500 East Market Street
Iowa City, IA 52245

Client ID: 3013788 Matter ID: 0008
RE: ASSET SALES

RRL
Invoice No. 935510
Invoice Date July 2, 2024

FOR PROFESSIONAL SERVICES RENDERED THROUGH May 31, 2024

Date	TKPR	Hours	Narrative	Amount
05/15/24	RRL	0.20	Correspondence with Lifepoint counsel re: sale of Eastern Iowa Rehab interest.	69.00
05/17/24	RRL	0.30	Correspondence with C. Clancey, M. Toney re: update on sale of Eastern Iowa Rehab interest to Lifepoint.	103.50
05/28/24	RRL	0.70	Correspondence with Lifepoint counsel re: sale of Eastern Iowa Rehab interest (.1); Correspondence with counsel for UCC re: same (.2); Research sale price of Eastern Iowa Rehab real estate per request from UCC (.2); Correspondence with M. Toney and J. Porter re: issues related to Eastern Iowa Rehab interest and issues raised by UCC re: same (.2).	241.50
05/30/24	RRL	0.40	Correspondence with counsel for Lifepoint re: request for details from Committee on 2021 transaction (.1); Correspondence with J. Porter re: same and review financials received (.2); Correspondence with Committee re: same (.1).	138.00
05/31/24	DWH	0.40	Review MidWestOne objection to sale of Thompson Trust property in order to assist with reply brief.	110.00
Sub-Total Fees:				662.00

SUMMARY OF PROFESSIONAL SERVICES

PROFESSIONAL	HOURS	HOURLY RATE	AMOUNT
Dana W. Hempy	0.40	275.00	110.00
Roy R. Leaf	1.60	345.00	552.00
	2.00		662.00
TOTAL CURRENT BILLING:		\$	662.00

ACCOUNT SUMMARY

Previous Balance: \$ 21,011.30

Nyemaster Goode, P.C.

Client ID: 3013788 Matter ID: 0008

Page: 3

Payments

06/25/24 Mercy Iowa City <2,233.20>
(Bankruptcy)

Current Billing: \$ **662.00**

TOTAL DUE: \$ **19,440.10**

Outstanding Invoice Summary

Bill #	Bill Date	Bill Amount	Amount Due
918579	09/28/23	28,094.50	4,624.90
920138	10/26/23	10,406.00	2,081.20
921629	11/17/23	22,057.00	1,451.40
923062	12/14/23	3,041.00	608.20
925501	01/29/24	11,044.50	2,208.90
927151	02/26/24	38,229.00	6,670.80
929468	04/02/24	2,887.00	574.40
932918	05/21/24	2,791.50	558.30



Mercy Iowa City (Bankruptcy)
500 East Market Street
Iowa City, IA 52245

Invoice No. 935511
Invoice Date: July 2, 2024
Client ID: 3013788
Matter ID: 0009
Billing Attorney: RRL

Current Billing: **\$2,124.00**

Amount Remitted: \$ _____

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ACCOUNT AGING

Current	Under 60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Due
\$2,124.00	\$742.50	\$2,150.10	\$3,255.90	\$3,292.00	\$11,564.50

REMITTANCE COPY

Kindly Remit Payment Upon Receipt

Please Make Checks Payable to "Nyemaster Goode, P.C."

ACH or wire payment also accepted

Please Note: New ACH Instructions

Routing Number: _____

Account Number: _____



Mercy Iowa City (Bankruptcy)
500 East Market Street
Iowa City, IA 52245

Client ID: 3013788 Matter ID: 0009
RE: PLAN AND DISCLOSURE STATEMENT

RRL
Invoice No. 935511
Invoice Date July 2, 2024

FOR PROFESSIONAL SERVICES RENDERED THROUGH May 31, 2024

Date	TKPR	Hours	Narrative	Amount
05/01/24	RRL	0.50	Review plan per questions for C. Davison and follow up correspondence re: same (.4); Correspondence with D. Simon and E. Keil re: same (.1).	172.50
05/02/24	RRL	0.20	Attention to correspondence from C. Davison re: plan and correspondence with D. Simon, E. Keil re: same (.1); Correspondence with Epiq re: pension voting question from pensioner (.1).	69.00
05/02/24	KMS	0.10	Correspondence with William Henrich and FTI regarding Liquidating Trustee proposal and counsel.	45.00
05/03/24	RRL	0.90	Correspondence with US Trustee counsel re: changes to plan language and draft same (.4); Correspondence with D. Simon and E. Keil re: same and amendments to plan (.3); Correspond with Lifepoint re: requested plan objection deadline (.1); Review tabulation report from Epiq (.1); .	310.50
05/06/24	RRL	0.20	Correspondence with Epiq re: voting certification and provisional pension ballots late filed.	69.00
05/07/24	RRL	0.40	Call with E. Keil re: issues on late filed ballots (.2); Follow up correspondence with E. Young from Epiq re: same (.2).	138.00
05/08/24	RRL	0.30	Correspondence with counsel for Owens and Minor re: voting amount and follow up with Epiq re: same (.1); Correspondence with Epiq re: tabulation of provisional votes, voting certification (.2).	103.50
05/09/24	RRL	0.10	Review correspondence with parties in interest re: scope of third party release.	34.50

Nyemaster Goode, P.C.

Client ID: 3013788 Matter ID: 0009

Page: 3

Date	TKPR	Hours	Narrative	Amount
05/14/24	RRL	1.60	Call with P. Roby re: pension update and changes to plan re: same (.2); Follow up call with Sisters of Mercy counsel re: same (.3); Review plan and confirmation order re: changes to same (.3); Correspondence with E. Keil, D. Simon, and F. Perlman re: same (.2); Call and correspond with Lifepoint counsel re: Eastern Iowa Rehab counsel (.3); Review plan and confirmation order for changes to same (.2); Correspond with E. Keil re: same (.1).	552.00
05/21/24	KMS	0.70	Status conference with Principal Financial counsel and business team regarding pensioner's trust and outstanding issues for plan.	315.00
05/21/24	KMS	0.10	Correspondence with Attorney Israel for Sisters of Mercy regarding trust administrators at Principal for pensioner plan.	45.00
05/22/24	KMS	0.20	Correspondence with Attorneys Israel and Epp regarding status on pensioner's trust sponsorship and Sisters of Mercy.	90.00
05/24/24	KMS	0.20	Exchange correspondence with Principal regarding pensioner's trust and directions for future.	90.00
05/29/24	KMS	0.10	Correspondence with Principal Financial attorney Deb Epp regarding pensioner's trust status and possible Plan amendments with Sisters of Mercy following update from Attorney Israel.	45.00
05/30/24	KMS	0.10	Correspondence with Principal Financial Attorney Deb Epp regarding pending confirmation consideration by the Court and anticipated effective date.	45.00

Sub-Total Fees: 2,124.00

SUMMARY OF PROFESSIONAL SERVICES

PROFESSIONAL	HOURS	HOURLY RATE	AMOUNT
Roy R. Leaf	4.20	345.00	1,449.00
Kristina M. Stanger	1.50	450.00	675.00
	<u>5.70</u>		<u>2,124.00</u>

TOTAL CURRENT BILLING: \$ 2,124.00

ACCOUNT SUMMARY

Previous Balance:		\$	21,010.90
Payments			
06/04/24	Mercy Hospital		<8,600.40>
06/25/24	Mercy Iowa City (Bankruptcy)		<2,970.00>
Current Billing:		\$	<u>2,124.00</u>

Nyemaster Goode, P.C.

Client ID: 3013788 Matter ID: 0009

Page: 4

TOTAL DUE: \$ **11,564.50**

Outstanding Invoice Summary

Bill #	Bill Date	Bill Amount	Amount Due
921630	11/17/23	238.00	47.60
923064	12/14/23	2,041.00	408.20
925504	01/29/24	691.00	138.20
927152	02/26/24	13,490.00	2,698.00
929469	04/02/24	16,279.50	3,255.90
931311	04/29/24	10,750.50	2,150.10
932919	05/21/24	3,712.50	742.50



Mercy Iowa City (Bankruptcy)
500 East Market Street
Iowa City, IA 52245

Invoice No. 935512
Invoice Date: July 2, 2024
Client ID: 3013788
Matter ID: 0010
Billing Attorney: RRL

Current Billing: **\$1,725.00**

Amount Remitted: \$ _____

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ACCOUNT AGING

Current	Under 60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Due
\$1,725.00	\$172.50	\$474.00	\$0.00	\$7,613.40	\$9,984.90

REMITTANCE COPY

Kindly Remit Payment Upon Receipt

Please Make Checks Payable to "Nyemaster Goode, P.C."

ACH or wire payment also accepted

Please Note: New ACH Instructions

Routing Number: _____

Account Number: _____



Mercy Iowa City (Bankruptcy)
500 East Market Street
Iowa City, IA 52245

Client ID: 3013788 Matter ID: 0010
RE: EXECUTORY CONTRACTS AND LEASES

RRL
Invoice No. 935512
Invoice Date July 2, 2024

FOR PROFESSIONAL SERVICES RENDERED THROUGH May 31, 2024

Date	TKPR	Hours	Narrative	Amount
05/01/24	RRL	0.30	Correspondence with Kronos counsel re: rejection of contract and review rejected contracts for same (.2); Follow up correspondence with C. Karambelas re: same (.1).	103.50
05/03/24	RRL	0.10	Correspond with UKG counsel re: status of rejection motion.	34.50
05/06/24	RRL	0.10	Correspondence with C. Karambelas re: outstanding items for contracts rejected under Plan.	34.50
05/07/24	RRL	1.10	Participate in call with J. Porter and C. Karambelas re: assumed and rejected contracts (.7); Review chart provided in preparation for same (.1); Follow up correspondence with C. Karambelas re: contracts for rejection and review same (.3).	379.50
05/13/24	RRL	1.30	Correspond with C. Karambelas re: contracts for assumption motion (.2); Review contracts and preliminary list for issues related to same (.9).	448.50
05/14/24	RRL	0.60	Review Deloitte Consulting pension agreement and correspond with P. Brubaker re: same (.5); Correspondence with C. Karambelas re: Principal contract renewal (.1).	207.00
05/15/24	RRL	1.00	Calls with C. Karambelas and J. Porter re: assumed contracts (.4); Correspondence re: same (.1); Review and revise Marquette contract for pension (.3); Correspondence with P. Brubaker,, M. Ross, and P. Roby re: same (.2).	345.00
05/21/24	RRL	0.10	Correspondence with counsel for BDO re: motion to assume.	34.50
05/23/24	RRL	0.40	Review draft revised SOW for Revology collections and correspond with J. Porter re: same (.3); Call with J. Porter re: same (.1).	138.00

Sub-Total Fees: 1,725.00

Nyemaster Goode, P.C.

Client ID: 3013788 Matter ID: 0010

Page: 3

SUMMARY OF PROFESSIONAL SERVICES

PROFESSIONAL	HOURS	HOURLY RATE	AMOUNT
Roy R. Leaf	5.00	345.00	1,725.00
	5.00		1,725.00
TOTAL CURRENT BILLING:		\$	1,725.00

ACCOUNT SUMMARY

Previous Balance:	\$	10,845.90
Payments		
06/04/24 Mercy Hospital		<1,896.00>
06/25/24 Mercy Iowa City (Bankruptcy)		<690.00>
Current Billing:	\$	1,725.00
TOTAL DUE:	\$	9,984.90

Outstanding Invoice Summary

Bill #	Bill Date	Bill Amount	Amount Due
918577	09/28/23	767.00	153.40
920297	10/31/23	12,247.50	2,449.50
921642	11/20/23	13,353.00	2,670.60
923066	12/14/23	6,409.50	1,281.90
925505	01/29/24	4,721.36	815.90
927153	02/26/24	1,210.50	242.10
931312	04/29/24	2,370.00	474.00
932920	05/21/24	862.50	172.50



Mercy Iowa City (Bankruptcy)
500 East Market Street
Iowa City, IA 52245

Invoice No. 935513
Invoice Date: July 2, 2024
Client ID: 3013788
Matter ID: 0011
Billing Attorney: RRL

Current Billing: \$0.00

Amount Remitted: \$ _____

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ACCOUNT AGING

Current	Under 60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Due
\$0.00	\$62.10	\$165.60	\$0.00	\$82.20	\$309.90

REMITTANCE COPY

Kindly Remit Payment Upon Receipt

Please Make Checks Payable to "Nyemaster Goode, P.C."

ACH or wire payment also accepted

Please Note: New ACH Instructions

Routing Number: [REDACTED]

Account Number: [REDACTED]



Mercy Iowa City (Bankruptcy)
500 East Market Street
Iowa City, IA 52245

Client ID: 3013788 Matter ID: 0011
RE: CLAIMS ANALYSIS AND RECOVERY

RRL
Invoice No. 935513
Invoice Date July 2, 2024

FOR PROFESSIONAL SERVICES RENDERED THROUGH May 31, 2024

TOTAL CURRENT BILLING: \$ 0.00

ACCOUNT SUMMARY

Previous Balance:		\$	1,220.70
Payments			
06/04/24	Mercy Hospital		<662.40>
06/25/24	Mercy Iowa City (Bankruptcy)		<248.40>
Current Billing:		\$	<u>0.00</u>
TOTAL DUE:		\$	309.90

Outstanding Invoice Summary

Bill #	Bill Date	Bill Amount	Amount Due
927154	02/26/24	411.00	82.20
931313	04/29/24	828.00	165.60
932921	05/21/24	310.50	62.10



Mercy Iowa City (Bankruptcy)
500 East Market Street
Iowa City, IA 52245

Invoice No. 935514
Invoice Date: July 2, 2024
Client ID: 3013788
Matter ID: 0012
Billing Attorney: RRL

Current Billing: **\$2,955.00**

Amount Remitted: \$ _____

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ACCOUNT AGING

Current	Under 60 Days	61-90 Days	91-120 Days	Over 120 Days	Total Due
\$2,955.00	\$984.30	\$1,953.60	\$0.00	\$10,335.50	\$16,228.40

REMITTANCE COPY

Kindly Remit Payment Upon Receipt

Please Make Checks Payable to "Nyemaster Goode, P.C."

ACH or wire payment also accepted

Please Note: New ACH Instructions

Routing Number: _____

Account Number: _____



Mercy Iowa City (Bankruptcy)
500 East Market Street
Iowa City, IA 52245

Client ID: 3013788 Matter ID: 0012
RE: AVOIDANCE ACTIONS AND LITIGATION

RRL
Invoice No. 935514
Invoice Date July 2, 2024

FOR PROFESSIONAL SERVICES RENDERED THROUGH May 31, 2024

Date	TKPR	Hours	Narrative	Amount
05/06/24	RRL	0.10	Attention to correspondence with K. Stanger and S. Techau re: status of wind down of workers compensation plan and claims.	34.50
05/06/24	KMS	0.30	Exchange correspondence with Jim Porter and Kara Borodkin regarding Sedgwick expenses, Dentons legal counsel invoice for workers' compensation and termination of excess policy.	135.00
05/06/24	SGT	0.60	Correspondence from Mr. Porter regarding status of work comp payments and how it will work going forward. (.2) Review proposed response from Ms. Stanger to give input on work comp specific questions. (.2) Correspondence to Mr. Moore at Sedgwick regarding status of request to Insurance Division. (.2) .	207.00
05/07/24	KMS	0.20	Exchange correspondence with Peg Brubaker and Mark Toney regarding commutation of workers compensation claims status.	90.00
05/09/24	SGT	0.20	Correspondence from Ms. Borodkin regarding any progress on getting payment approved to go out from Hills Bank.	69.00
05/10/24	RRL	0.20	Review lift stay request received from litigation counterparty and correspond with E. Keil and D. Simon re: same.	69.00
05/10/24	SGT	0.20	Correspondence from Mr. Moore and review attached documentation for request for payment.	69.00
05/10/24	SGT	0.20	Correspondence from Mr. Moore checking on the status of payment of the settlement amount.	69.00
05/13/24	SGT	0.10	Correspondence from Mr. Moore following up on when payment can be made to the claimant.	34.50

Nyemaster Goode, P.C.

Client ID: 3013788 Matter ID: 0012

Page: 3

Date	TKPR	Hours	Narrative	Amount
05/14/24	RRL	0.30	Research re: Banks action and parties thereto (.1); Correspond with counsel for plaintiff re: consensual lift stay order (.1); Review proposed motion re: same (.1).	103.50
05/15/24	RRL	0.20	Review proposed order from Banks counsel and correspondence with Banks counsel re: same (.1); Correspondence with Mercy Services malpractice counsel re: same (.1).	69.00
05/16/24	KMS	0.30	Settlement discussions regarding Dorothy Lyons' workers' compensation settlement and pensioners' claims.	135.00
05/20/24	SGT	0.20	Correspondence from Mr. Moore regarding payment to the claimant of the settlement amount and his concerns/questions.	69.00
05/22/24	RRL	0.70	Call with counsel for plaintiff re: request to lift stay against Mercy Hospital (.2); Review proof of claims received re: same (.1); Follow up correspondence with UCC and liquidating trustee re: same (.2); Correspond with UCC counsel and client re: insurance policies in place and provide copies of same (.2).	241.50
05/23/24	SGT	0.10	Correspondence from Mr. Moore asking when the Lyons settlement payment will be issued.	34.50
05/24/24	RRL	0.20	Call and correspond with J. Taylor re: lift stay request.	69.00
05/24/24	SGT	0.10	Correspondence from Ms. Borodkin regarding next step in order to get payments made/issued.	34.50
05/24/24	KMS	0.20	Exchange correspondence with Attorney Moore regarding Dorothy Lyons settlement and pending Ch 11 plan with Court.	90.00
05/24/24	SGT	0.40	Correspondence from and to Mr. Moore regarding getting payment for ongoing expenses issued. (.2) Analyze with Ms. Stanger the best way to get payment issued and determine if we need a call with Mr. Moore. (.2) .	138.00
05/28/24	RRL	1.50	Calls with J. Taylor re: requests to lift stay for state court litigation (.5); Follow up correspondence with J. Taylor re: same (.2); Correspondence with counsel for UCC re: same (.2); Review insurance policies for UCC questions re: same (.3); Correspond with client re: lift stay request, insurance policy requests from UCC (.3).	517.50
05/28/24	KMS	0.20	Telephone conference with Sedgwick representative (Michael Moore) regarding Lyons' workers' compensation commuted settlement and Liquidating Trustee future authority.	90.00

Nyemaster Goode, P.C.

Client ID: 3013788 Matter ID: 0012

Page: 4

Date	TKPR	Hours	Narrative	Amount
05/28/24	SGT	0.40	Correspondence from Ms. Lair at the Insurance Division that the detail provided is what is needed. (.2) Correspondence to Ms. Lair asking what needs to be done now to actually get the funds released from Hills Bank. (.2). .	138.00
05/29/24	RRL	0.50	Correspondence with Committee counsel re: review of Debtors' malpractice policies (.1); Correspond with J. Porter and brokers for copies of same (.2); Update to Committee counsel re: status of lift stay request and review letter re: same (.2).	172.50
05/29/24	SGT	0.40	Correspondence from Ms. Lair about where the check can be sent to. (.1); Confirm with Ms. Stanger that no concerns with Hills Bank issuing payment directly to Sedgwick; (.2); Correspondence to Ms. Lair confirming that funds can be released directly to Sedgwick. (.1).	138.00
05/30/24	SGT	0.20	Correspondence from and to Ms. Borodkin regarding getting the pending medical bills paid from the Hills bank account.	69.00
05/30/24	RRL	0.20	Correspondence with P. Roby, R. Gainer, and J. Taylor re: request to lift stay and consent to same.	69.00

Sub-Total Fees: 2,955.00

SUMMARY OF PROFESSIONAL SERVICES

PROFESSIONAL	HOURS	HOURLY RATE	AMOUNT
Stephanie G. Techau	3.10	345.00	1,069.50
Roy R. Leaf	3.90	345.00	1,345.50
Kristina M. Stanger	1.20	450.00	540.00
	8.20		2,955.00

TOTAL CURRENT BILLING: \$ 2,955.00

ACCOUNT SUMMARY

Previous Balance:		\$	25,025.00
Payments			
06/04/24	Mercy Hospital		<7,814.40>
06/25/24	Mercy Iowa City (Bankruptcy)		<3,937.20>
Current Billing:		\$	<u>2,955.00</u>
TOTAL DUE:		\$	16,228.40

Outstanding Invoice Summary

Bill #	Bill Date	Bill Amount	Amount Due
918560	09/28/23	12,385.52	2,429.50

Nyemaster Goode, P.C.

Client ID: 3013788 Matter ID: 0012

Page: 5

920298	10/31/23	14,253.50	2,850.70
921631	11/17/23	12,215.00	2,443.00
923068	12/14/23	10,276.00	2,055.20
925506	01/29/24	147.50	29.50
927155	02/26/24	2,638.00	527.60
931314	04/30/24	9,768.00	1,953.60
932911	05/21/24	4,921.50	984.30